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GENEVA WORKS



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Mr. Lowell P. Braxton Administrator Mineral Resource Development and Reclamation Program Oil, Gas & Mining Board 355 West North Temple Suite 350 Salt Lake City, UT 84180



DIVISION OF OIL, GAS & MINING

Re: Review of MR-1 Submittal, Iron Mountain Mine, PRO/021/008, Iron County, Utah

Dear Mr. Braxton:

Please find attached answers to the review comments by your staff letter dated March 5, 1986 to me.

If you have further questions, please feel free to contact me. I hope the attached will answer the questions and concerns the staff had in permitting the operation.

Sincerely,

Roy Benson

U. S. Steel Corp.

P. O. Box 20-B, RFD #1 Santaquin, Utah 84655

Attachment

FILE COPY

#### MR-1 REVIEW

Rule M-3 (1) (1)

I was confused thinking the disturbed area and the permit area were one in the same. Please note on the attached map, the area outlined in blue will be the permit area.

At the time the staff visited the site, a large reject pile was observed with a material about  $2\frac{1}{2}$ " x 0" in size. This was a concern of some members of the staff. Since that time that stockpile was given to the Iron County Road Commission as a road base and has been removed. They also are waiting for us to produce about three times that much more.

In addition, I have received permission, as suggested by the staff, to use top soil (note red on map) they observed, to develop a seed bed on the disturbed area which will greatly increase post mining activity as far as wildlife is concerned. I feel this will be much more attractive to those members of the staff that had a question of the prior seed bed capabilities.

Rule M-3 (2) (A) & (B)

The property being private and surrounded by junipers and conifers has not in the past been used for livestock grazing. However, in the past and currently numerous deer do frequent the area. With the introduction of legumes, grasses and brouse which are more conducive to deer habitat than the yellow brush that currently covers the area, I feel we will only enhance the deer habitat.

Road disposition will be as follows. All roads will be scarified and seeded except those needed for access to private property: (1) to U. S. Steel, (2) to Union Pacific Railroad, and (3) to Colorado Fuel and Iron. Note on map in yellow. Those roads outlined in blue will be reclaimed and seeded.

Also, the width of the roads not reclaimed can be reduced from the current 60 feet width to about 30 feet width just to accommodate future small vehicular traffic instead of haulage trucks.

Rule M-3 (2) (d)

There will not be any backfill involved as the pile we are consuming is above ground. We will remove that stockpile down to where we start cutting original ground (topsoil). This surface will slope uphill on about a 6% grade which is the original grade. When the pile is consumed, the area currently beneath the stockpile will be observed for topsoil depth and soil condition. If soil conditions are insufficient to provide seed bed, necessary steps will be taken to rectify the condition. This can only be done when the area can be observed and is accessible.

The reject material is discharged from a conveyor belt and is currently being removed as fast as it is dropped by the County Road Department. When this is no longer the case, the rejects will be dozed daily for approximately one

hour each day in the development of the waste area on Map No. 1. Currently, we are approximately one-fifth completed with the project and stockpiled waste is essentially non-existent.

Rule M-3 (2) (E) Planting will be addressed in M-10 (12) below.

Rule M-3 (2) (F) Reclamation Timetable.

Due to the limited area and the amount of and types of equipment being used on the project, it would not be feasible or possible to reclaim portions of the work area until we are completed with the project which is scheduled for the spring of 1988. Actual reclamation after the project completion will take about two weeks.

This will include hauling and spreading 6,388 cubic yards of top soil, scarifying roads, contouring waste reject dump and covering top and slope with soil and drill seeding the area. Hand planting of shrubs.

### Rule M-5 Cost Estimate

D-9 Caterpillar one hour/day at \$100.00/hour X 260 days	\$26,000.00
Two 30-yard <sup>3</sup> haulage trucks at \$110.00/hour X 32 hours	3,520.00
One 980-B loader 16 hours at \$100.00/hour	1,600.00
Grass and shrubs	640.00
Seed drilling 12 acres @ \$30.00/acre	360.00
Total Cost of Reclamation	\$32,120.00

## Rule 10 (1) Land Use

Land use by man will be limited to an occasional hiker or prospector due to access limitations. Wildlife will consist mostly of mule deer and ground squirrels for which the habitat should be enhanced.

# Rule M-10 (2) (b) Trash and Debris

Metallic scrap will be sent to Geneva Works for re-cycling. Garbage will be retained and transported to Iron County sanitary land fill for disposal.

#### Rule M-10 (2) (d)

No Trespassing - Private Property signs are in place on the only access road, and a locked metal gate is also maintained at the signed location. Note road map red mark.

Those needing property access in the future will be U. S. Steel to maintain private property through the area, C.F.& I. to maintain private property, Utah Power and Light meter service, and Union Pacific Railroad to maintain trackage currently in use.

Rule M-10 (4) Map

Enclosed.

Rule M-10 (5) HGHWARES

Banks will be monitored by placing survey markers at strategic locations on the perimeter of the pile with specific distances and elevations referenced to monitor points with primary control point located on stable ground. Actual locations and distances will need to be located upon completion of seeding and grading.

Rule M-10 (11) Sediment Control

If necessary, a catch basin or settling pond could be constructed for the purpose of sediment control. However, I don't feel this will be a problem considering the arid climate and limited rainage on the permit area.

Rule M-10 (12) and Rule 10 (12) (2) - Rule 12 (2) (a) and Rule 12 (2) (b)

Please refer to the attached study compiled by members of Southern Utah State College faculty on the Comstock Mine area which is in the same mining district as Iron Mountain approximately two miles northeast.

This report was compiled by Dr. B. Al Tait and Richard A. Dotson, and we will use it as our guidelines on revegetation. I regret the photos on the Summary and Final Report on Revegetation of Overburden Deposits at the Comstock Mine, Cedar City, Utah, aren't clear, but you have on file for Colorado Fuel & Iron this same report if you need to refer to it for clarification.